

EXHIBIT C

Anthony Irpino

From: Sharon Desh <Sharon.desh@bartlitbeck.com>
Sent: Wednesday, April 8, 2020 6:11 PM
To: Pearl Robertson
Cc: Anthony Irpino
Subject: MDL Opioids: Privilege exchange
Attachments: 2019-3-14_PECs_Challenges_to_WAG_Priv_Claims + WAG Response.xlsx; 2020-2-14_PECs_Challenges_to_WAG_Priv_Claims + WAG Response.xlsx

Pearl,

Attached please find Walgreens' response to Plaintiffs' privilege challenges based on our recent meet and confers.

We believe that this should provide Plaintiffs with all of the information you desire. However, if there is more I can provide that will allow the parties to resolve this collaboratively, please let me know.

As explained in our prior correspondence and meet and confers, it is Walgreens' position that Plaintiffs have waived their Track One A privilege challenges by not bringing them in a timely fashion, and by not providing an explanation for their delay. In addition, as a general matter, Walgreens is incentivized to negotiate privilege challenges with Plaintiffs only under the understanding that agreements we make collaboratively will be honored, and that Plaintiffs will not seek rulings on documents outside of this collaborative process. The offers of downgrades being made in these submissions are expressly contingent on the parties reaching full agreement without requesting a ruling from the Special Master. If we are not able to reach that point, Walgreens reserves the right to put forth its waiver argument with respect to all challenges.

We remain hopeful that we can find a workable process between us, and implement that for all challenges going forward.

Thank you,

Sharon

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